HELLRING LINDEMAN GOLDSTEIN & SIEGAL LLP

COUNSELLORS AT LAW

BERNARD HELLRING (1916-1991)
JOEL D. SIEGAL ^Δ
JONATHAN L. GOLDSTEIN ^Δ
MICHAEL EDELSON
MARGARET DEE HELLRING ^Δ
RICHARD D. SHAPIRO ^Δ
CHARLES ORANSKY ^Δ
RICHARD B. HONIG ^Δ
RICHARD B. HONIG ^Δ
RICHARD K. COPLON ^Δ
ROBERT S. RAYMAR ^Δ
RONNY J. G. SIEGAL ^Δ
STEPHEN L. DREYFUSS ^Δ
JOHN A. ADLER ^Δ
JUDAH I. ELSTEIN ^Δ
BRUCE S. ETTERMAN ^Δ
MATTHEW E. MOLOSHOK ^Δ
DAVID N. NARCISO ^Δ
ROBERT B. ROSEN ^Δ
SHERYL E. KOOMER
PATRICIA A. STAIANO
RONNIE F. LIEBOWITZ
LISA P. PARKER
CHRISTY L. SAALFELD ^Δ
CHAMISE CARTER ^Δ

ONE GATEWAY CENTER
NEWARK, NEW JERSEY 07102-5386
(973) 621-9020

FAX (973) 621-7406 www.higslaw.com

OF COUNSEL

October 29, 2007

YN Δ LN $^{\Delta}$

Via Electronic Mail

Honorable Morris Stern, U.S.B.J. United States Bankruptcy Court District Of New Jersey Dr. Martin L. King, Jr. Federal Building 50 Walnut Street Newark, New Jersey 07102

Re:

In re: PITTRA G.B. International, Inc.

Case No. 06-10889 (MS)

Dear Judge Stern:

This firm represents Benjamin A. Stanziale, Jr., Chapter 7 Trustee ("Trustee") for PITTRA G.B. International, Inc. ("Debtor"). Last week the Trustee filed a motion to compel Merrill Lynch Business Financial Services, Inc. ("MLBFS") to comply with outstanding discovery and seeking sanctions. The next day, MLBFS filed a motion to dismiss the Chapter 7 case. Both motions are returnable on November 13, 2007 at 12:00 p.m.

The MLBFS motion to dismiss is fact-intensive. Because of this, and because of the significant impact these motions will have on the unsecured creditors in this case, the Trustee will engage in limited discovery before the return date of the motions and will plan on presenting testimony on the return date. Accordingly, the Trustee respectfully requests that the Court schedule an evidentiary hearing on the motion to dismiss.

Case 06-10889-MS Doc 46 Filed 10/29/07 Entered 10/29/07 10:38:36 Desc Main Document Page 2 of 2

HELLRING LINDEMAN GOLDSTEIN & SIEGAL LLP

Hon. Morris Stern, U.S.B.J. October 29, 2007 Page 2

We thank the Court for its attention to this matter.

Respectfully submitted,

Patricia A. Staiano

PAS:bw

cc: Benjamin A. Stanziale, Jr., Esq. (via email)
Martha Hildebrandt, AUST (via email)
James A. Scarpone, Esq. (Via email)
George R. Hirsch, Esq. (via email)
John M. August, Esq. (via email)
Ben H. Becker, Esq. (via email)
A. Michael Covino, Esq. (via email)
Andrew Anselmi, Esq. (via facsimile)
John Gleason, Esq. (via email)
Frederick B. Polak, Esq. (via email)
Vincent F. Papalia, Esq. (via email)